

Buchanan Ingersoll PC

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March 11, 2005

VIA E-FILING AND HAND DELIVERY

The Honorable Sue L. Robinson
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, DE 19801

Re: Raynor v. Assoc. Elec. & Gas Services Ltd., C.A. No. 04-1344-SLR

Dear Chief Judge Robinson:

This firm represents plaintiff John P. Raynor in the above-referenced action. I have conferred with counsel for defendant Associated Electric & Gas Services Limited ("AEGIS") and write on behalf of all parties with respect to the telephonic scheduling conference with the Court currently scheduled for March 22, 2005 at 8:30 a.m. Mr. Raynor and AEGIS have agreed to a settlement of this action that is contingent upon final approval by the Delaware Court of Chancery of the settlement of a related class action, *In re Emerging Communications, Inc. Shareholders Litig.*, C.A. No. 16415, to which Mr. Raynor is a defendant. While the parties to the *Emerging* action have filed executed settlement papers with the Court of Chancery, notice of the settlement has not yet been mailed to class members and the Court has not yet scheduled a hearing at which to consider and potentially approve the settlement.

Under these circumstances, the parties respectfully submit that it would not be efficient or productive at this time to submit a discovery plan or conduct a scheduling conference with the Court. Instead, the parties propose postponing the currently-scheduled conference and providing the Court with a written update on the *Emerging* action on or before May 31, 2005. If before that date the settlement of the *Emerging* action is rejected by the Court of Chancery or becomes ineffective for any other reason, the parties will notify the Court promptly and proceed with this action. Should the settlement of the *Emerging* action be approved prior to May 31, 2005, the parties will dismiss this action in accordance with the terms of their settlement.

The parties also have agreed that the time period within which AEGIS must answer or otherwise move in response to the complaint should be extended further until June 17, 2005. A proposed order reflecting this schedule is enclosed for Your Honor's consideration.

The parties appreciate the Court's consideration of their request. If Your Honor has any questions concerning this matter, counsel for Mr. Raynor and AEGIS are available at the convenience of the Court.

March 11, 2005

Page 2

Respectfully,



Thad J. Bracegirdle

Enclosure

cc: Clerk of the Court (via e-filing, w/encl.)
Barry M. Klayman, Esquire (via hand delivery, w/encl.)